

SAN DIEGO REGIONAL
WATER QUALITY
CONTROL BOARD



SECOR
INTERNATIONAL
INCORPORATED

WWW.SECOR.COM
2655 Camino Del Rio N. Suite 302
San Diego, CA 92108
619-296-6195 TEL
619-296-6199 FAX

April 19, 2004 2004 APR 19 P 2:47

Project No. 08EL.20342.04

Mr. John H. Robertus
California Regional Water Quality Control Board, San Diego Region
9174 Sky Park Court, Suite 100
San Diego, CA 92123

Subject: Review of Complaint No. R9-2004-0059
7-Eleven Location No. 20342
487 Vandegrift Boulevard
Oceanside, California
Reference: CA:14-0795.02:melbf

Dear Mr. Robertus:

SECOR International Incorporated (SECOR) on behalf of 7-Eleven Inc. (7-Eleven), has reviewed a notice of violation dated February 26, 2004, regarding the National Pollutant Discharge Elimination System (NPDES) permit for groundwater pumping and treatment at the subject site. The violation in question is an instantaneous maximum total nitrogen concentration in a sample collected on July 9, 2001. SECOR has reviewed the historic files for the site, and presents the following for consideration.

- Quarterly samples (per requirements of the NPDES permit) were collected from March 1999 to January 2001 (eight samples total). One sample contained a total nitrogen concentration of 0.7 milligrams per liter (mg/L). Total nitrogen was below a laboratory reporting limit of 0.5 mg/L in the seven remaining samples. Historic total nitrogen concentrations are presented in Table 1. There was no prior indication of total nitrogen exceeding the specified discharge limitation of 2.0 mg/L. Based on the prior analytical results, SECOR had no reason to suspect that nitrogen concentrations would be detected. The reported concentration appears to be a statistical anomaly.
- There was a delay of approximately 2.5 years between the alleged discharge violation, and receipt of the complaint. This time lapse makes it impossible to recreate the sampling event, check sampling procedures or protocols, or make any determination of potential sources of the nitrogen.
- For the reporting period, the groundwater extraction system operated from July 1, 2001, through July 11, 2001, and was shut down permanently on July 11, 2001. The system was never re-started, and no further discharge occurred after July 11, 2001. Therefore, this was a one-time exceedance of discharge limitations.

Should you have any questions regarding this correspondence, please contact the undersigned at (619) 296-6195.

Respectfully,

SECOR International Incorporated

Patrick A. McConnell, R.G. #7205
Senior Geologist

John P. Wainwright, P.E.
Principal Engineer

Enclosure: Table 1 – Total Nitrogen Concentrations

cc: Ken Hilliard, 7-Eleven, Inc.
John Wainwright, SECOR

Table 1
TOTAL NITROGEN CONCENTRATIONS
7-Eleven Location No. 20342
All concentrations in milligrams per liter (mg/L).

Sample Date	Total Nitrogen
03/29/99	<0.5
07/12/99	<0.5
10/04/99	0.7
01/03/00	<0.5
04/03/00	<0.5
07/03/00	<0.5
10/16/00	<0.5
01/08/01	<0.5
07/09/01	3.9